

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

X

Chapter 11

W. R. GRACE & CO., et al.,¹

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Case No. 01-1139 (JKF)

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(Jointly Administered)

Debtors.

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**AFFIDAVIT OF ELLEN A. PRESBY, ESQ. IN SUPORT OF KANEB PIPE LINE
OPERATING PARTNERSHIP, L.P. AND SUPPORT TERMINAL SERVICES, INC.'S
MOTION FOR AN ORDER MODIFYING THE AUTOMATIC STAY**

STATE OF TEXAS

)

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SS:

COUNTY OF DALLAS

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I, Ellen A. Presby, being duly sworn according to law, do depose and say:

1. I am a practicing attorney and sole proprietor at the Presby Law Office, of Dallas, Texas. I am authorized to make this affidavit. Unless otherwise stated, I make this affidavit based on firsthand personal knowledge acquired as trial counsel to Kaneb Pipe Line Operating Partnership, L.P. and Support Terminal Services, Inc. (collectively, “Kaneb”) in litigation in the 191st District Court of Dallas County, Texas (the “State Court Litigation”) against Grace Energy Corporation (“GEC”). I was lead counsel for Kaneb in the State Court Litigation through the development of the case until after the verdict was rendered. I acquired firsthand personal knowledge of the documents produced by GEC in the State Court Litigation through that process.

2. I submit this Affidavit in support of Kaneb's Motion for an Order Modifying the Automatic Stay (the "Motion").

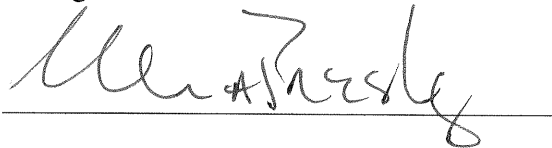
¹ The Debtors consist of 62 entities, including W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and the particular debtor involved in this Motion, Grace Energy Corporation.

The GEC Liability Policies

3. I represented Kaneb in State Court Litigation, which matter is now on appeal before the Court of Appeals for the Fifth District of Texas. Debtor Grace Energy Corporation ("GEC") is a party in the State Court Litigation.

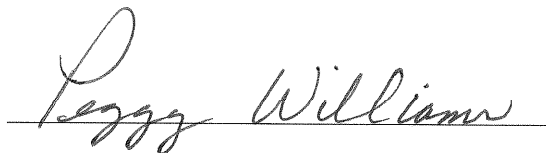
4. In support of its Motion, Kaneb is submitting an appendix (in electronic PDF format) of the insurance policies as to which it seeks relief from stay. Each such policy is identified by carrier, date, policy number and bates-number on Attachment A to this affidavit (the "Policies").

5. I have reviewed the disk containing electronic copies of the Policies. Each Policy is identified with a range of bates-numbering that includes the prefix, "GEC." This is the same prefix utilized by GEC in its production of documents, including copies of insurance policies, during the State Court Litigation. GEC's counsel in the State Court Litigation represented to me that documents bearing such bates prefixes were accurate copies of such documents exist in GEC's corporate records. I have no reason to believe that these documents are anything other than accurate copies of the GEC insurance policies as produced in the State Court Litigation.

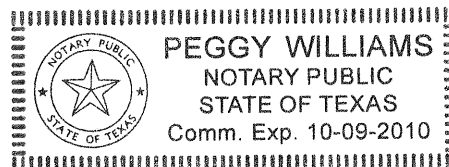


Ellen A. Presby, Esq.

Sworn to and subscribed before me this 15th day of January, 2009



Notary Public



ATTACHMENT "A-1" TO AFFIDAVIT OF ELLEN PRESBY

**THE GEC POLICIES
June 30, 1971 – June 30, 1988**

PRIMARY LIABILITY POLICIES

Continental Casualty

CCP 902-36-70 (6/30/73-6/30/76): Tab 1 (Bates Nos. GEC 029630 - GEC 029746)
CCP 248-3440 (6/30/76-6/30/83): Tab 2 (Bates Nos. GEC 029747 - GEC 030020)
CCP 248-3440 (6/30/83-6/30/88): Tab 3 (Bates Nos. GEC 030188 - GEC 030301)

EXCESS/UMBRELLA EXCESS LIABILITY POLICIES

Admiral

75 DD 0164 (SCX 0369) (6/30/75-6/30/76): Tab 10D (Bates Nos. GEC 025038 - GEC 025045)

American Employers' Insurance Company

EY-8220-005 (6/30/71-6/30/74): Tab 4 (Bates Nos. GEC 024585 - GEC 024629)

California Union

ZCX 0001391 (Cover Sheet 34078) (6/30/75-6/30/76): Tab 11D (Bates Nos. GEC 025070 - GEC 025071)

Central National Insurance Company of Omaha

CNU 12-33-83 (6/30/75-6/30/76): Tab 10C (Bates Nos. GEC 025032 - GEC 025037)

Continental Casualty

RDX 893-68-33 (8/9/73-6/30/74): Tab 6B (Bates Nos. GEC 024648 - GEC 024649)
RDX 033 915 66 45 (6/30/74-6/30/77): Tab 8 (Bates Nos. GEC 024736 - GEC 024742)
RDX 178-45-29 (6/30/84-6/30/85): Tab 29D (Bates Nos. GEC 028842 - GEC 028852)

First State Insurance Company

922099 (6/30/75-6/30/76): Tab 11C (Bates Nos. GEC 025063 - GEC 025069)

Gerling-Konzern

01/49/99/6282 (6/30/78-6/30/79): Tab 19D (Bates No. GEC 026197)

Granite State Insurance Company

6178-0491 (6/30/78-6/30/79): Tab 19C (Bates Nos. GEC 026189 - GEC 026196)
6179-1383 (6/30/79-6/30/80): Tab 21C (Bates Nos. GEC 026615 - GEC 026622)
6480-5013 (6/30/80-6/30/81): Tab 22C (Bates Nos. GEC 027050 - GEC 027058)
6481-5220 (6/30/81-6/30/82): Tab 23A (Bates Nos. GEC 027464 - GEC 027472)
6482-5442 (6/30/82-6/30/83): Tab 25C (Bates Nos. GEC 028005 - GEC 028015)
6483-5666 (6/30/83-6/30/84): Tab 27B (Bates Nos. GEC 028402 - GEC 028411)
6484-5867 (6/30/84-6/30/85): Tab 29A (Bates Nos. GEC 028819 - GEC 028824)

Home Insurance Company

HEC 9 91 99 45 (6/30/71-6/30/74): Tab 5 (Bates Nos. GEC 024630 - GEC 024638)

Insurance Company of North America (INA)

XCP 37 45 (6/30/71-6/30/74): Tab 6A (Bates Nos. GEC 024639 - GEC 024647)

Lexington Insurance Company

550-63-39 (6/30/77-6/30/78): Tab 18B (Bates Nos. GEC 025776 - GEC 025784)

5510442 (6/30/78-6/30/79): Tab 19B (Bates Nos. GEC 026179 - GEC 026188)

5514585 (6/30/79-6/30/80): Tab 21B (Bates Nos. GEC 026604 - GEC 026614)

5540469 (6/30/80-6/30/82): Tab 22B (Bates Nos. GEC 027042 - GEC 027049)

Lloyd's

76 DD 1594C (6/30/76-6/30/79): Tab 13A (Bates Nos. GEC 026053 - GEC 026098)

76 DD 1595C (6/30/76-6/30/79): Tabs 14A1 and 14A2 (Bates Nos. GEC 025379 - GEC 025400, and GEC 026115 - GEC 026136)

77 DD 1631C (6/30/77-6/30/78): Tab 18A (Bates Nos. GEC 025740 - GEC 025775)

78 DD 1417C (6/30/78-6/30/79): Tab 19A (Bates Nos. GEC 026137 - GEC 026178)

79 DD 1633C (6/30/79-6/30/82): Tab 20A (Bates Nos. GEC 026497 - GEC 026549)

79 DD 1634C (6/30/79-6/30/80): Tab 21A (Bates Nos. GEC 026554 - GEC 026603)

80 DD 1643C (6/30/80-6/30/82): Tab 22A (Bates Nos. GEC 027017 - GEC 027041)

KYO 17582 (6/30/82-6/30/85): Tab 24A (Bates Nos. GEC 028307 - GEC 028360)

KYO 17782 (6/30/82-6/30/85): Tabs 25A1, 25A2 and 25A3 (Bates Nos. GEC 027963 - GEC 027995, GEC 028373 - GEC 028391, and GEC 028794 - GEC 028818)

New Hampshire Insurance Company

5175-0444 (6/30/75-6/30/76): Tab 10B (Bates Nos. GEC 025025 - GEC 025031)

5175-0445 (6/30/75-6/30/76): Tab 11B (Bates Nos. GEC 025056 - GEC 025062)

Northbrook Insurance Company

63-001-170 (6/30/75-6/30/76): Tab 9 (Bates Nos. GEC 024988 - GEC 025014)

63-001-171 (6/30/75-6/30/76): Tab 10A (Bates Nos. GEC 025015 - GEC 025024)

63-001-172 (6/30/75-6/30/76): Tab 11A (Bates Nos. GEC 025046 - GEC 025055)

63-002-048 (6/30/76-6/30/79): Tabs 13B1, 13B2 and 13B3 (Bates Nos. GEC 025356 - GEC 025378, GEC 025715 - GEC 025730, and GEC026099 - GEC 026114)

63-005-793 (6/30/79-6/30/82): Tabs 20B1 and 20B2 (Bates Nos. GEC 026550 - GEC 026553, and GEC027007 - GEC 027016)

63-005-794 (6/30/79-6/30/80): Tab 21D (Bates Nos. GEC 026623 - GEC 026629)

63-006-854 (6/30/80-6/30/81): Tab 22D (Bates Nos. GEC 027059 - GEC 027063)

63-008-153 (6/30/81-6/30/82): Tab 23B (Bates Nos. GEC 027473 - GEC 027483)

Pacific Employers Group

XMO 01 72 04 (6/30/84-6/30/85): Tab 28 (Bates Nos. GEC 028785 - GEC 028793)

XCC 01 22 83 (6/30/84-6/30/85): Tab 29B (Bates Nos. GEC 028825 - GEC 028831)

XMO 017211 (6/30/85-6/30/86): Tab 30 (Bates Nos. GEC 029337 - GEC 029344)

XCC 012315 (6/30/85-6/30/86): Tab 31 (Bates Nos. GEC 029358 - GEC 029360)

Prudential Reinsurance Company

DXC 901145 (6/30/76-6/30/77): Tab 14B (Bates Nos. GEC 025401 - GEC 025407)

DXC DX 0250 (6/30/77-6/30/78): Tab 17 (Bates Nos. GEC 025731 - GEC 025739)

DXC DX 0251 (6/30/77-6/30/78): Tab 18C (Bates Nos. GEC 025785 - GEC 025794)

Transit Casualty

SCU 955-565 (6/30/80-6/30/81): Tab 22E (Bates Nos. GEC 027064 - GEC 027069)

SCU 955-978 (6/30/81-6/30/82): Tab 23C (Bates Nos. GEC 027484 - GEC 027492)

UMB 950-239 (6/30/82-6/30/85): Tabs 24B and 26 (Bates Nos. GEC 027951 - GEC 027962, and GEC 028361 - GEC 028372)

SCU 956-259 (6/30/82-6/30/83): Tab 25B (Bates Nos. GEC 027996 - GEC 028004)

SCU 956-535 (6/30/83-6/30/84): Tab 27A (Bates Nos. GEC 028392 - GEC 028401)

SCU 956-881 (6/30/84-6/30/85): Tab 29C (Bates Nos. GEC 028832 - GEC 028841)

Unigard Mutual Insurance Company

1-2517 (6/30/74-6/30/75): Tab 7 (Bates Nos. GEC 024722 - GEC 024735)

ATTACHMENT "A-2" TO AFFIDAVIT OF ELLEN PRESBY

**THE GEC POLICIES
CHRONOLOGICALLY, BY LAYER
June 30, 1971 – June 30, 1986**

Primary Layer	Disk, Tab #	Primary Policies
6/30/73 – 6/30/76	Tab 1	Continental Casualty Company CCP 902-36-70 (GEC029630 – GEC029746)
6/30/76 – 6/30/83	Tab 2	Continental Casualty Company CCP 248-3440 (GEC029747 – GEC030020)
6/30/83 – 6/30/88	Tab 3	Continental Casualty Company CCP 248-3440 (GEC030188 – GEC030301)

Excess Layers	Disk, Tab #	Excess Policies
6/30/71-6/30/74		
First Layer Excess	Tab 4	American Employers EY-8220-005 (5M) (GEC024585 – GEC024629)
Second Layer Excess	Tab 5	Home Insurance HEC 9 91 99 45 (5M) (GEC024630 – GEC024638)
Third Layer Excess	Tab 6A Tab 6B	INA XCP 37 45 (10M) (GEC024639 – GEC024647) Continental RDX 893-68-33 (10M) (8/9/73-6/30/74) (GEC024648 – GEC024649)
6/30/74 – 6/30/75		
First Layer Excess	Tab 7	Unigard Mutual Insurance Company 1-2517 (10M) (GEC024722 – GEC024735)
Second Layer Excess	Tab 8	Continental RDX 033 915 66 45 (10M) (GEC024736 – GEC024742)
6/30/75-6/30/76		
First Layer Excess	Tab 9	Northbrook 63-001-170 (1M) (GEC024988 – GEC025014)

Excess Layers	Disk, Tab #	Excess Policies
Second Layer Excess	Tab 10A	Northbrook 63-001-171 (1.5M) (GEC025015 - GEC025024)
	Tab 10B	New Hampshire 5175-0444 (1M) (GEC025025 - GEC025031)
	Tab 10C	Central National CNU 12-33-83 (1M) (GEC025032 - GEC025037)
	Tab 10D	Admiral 75 DD 0164 (SCX 039) (0.5M) (GEC025038 - GEC025045)
Third Layer Excess	Tab 11A	Northbrook 63 001 172 (3.5M) (GEC025046 - GEC025055)
	Tab 11B	New Hampshire 5175-0445 (0.625M) (GEC025056 - GEC025062)
	Tab 11C	First State 922099 (0.625M) (GEC025063 - GEC025069)
	Tab 11D	California Union ZCX 0001391 (0.25M) (Bowring Cover Note 34078) (GEC025070 - GEC025071)
Fourth Layer Excess	Tab 12	Continental RDX 033 915 66 45 (10M) (GEC025072 - 025078)
6/30/76-6/30/77		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC026053 - GEC026098)
	Tab 13B1	Northbrook 63-002-048 (1M) (GEC025356 - GEC025378)
Second Layer Excess	Tab 14A1	Lloyd's 76 DD 1595C (4M) (GEC025379 - GEC025400)
	Tab 14B	Prudential Re DXC 901145 (1M) (GEC025401 - GEC025407)
Third Layer Excess	Tab 15	Continental RDX 033 915 66 45 (10M) (GEC025408 - GEC025414)
6/30/77-6/30/78		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC026053 - GEC026098)
	Tab 13B2	Northbrook 63-002-048 (1M) (GEC025715 - GEC025730)
Second Layer Excess	Tab 14A1	Lloyd's 76 DD 1595C (5M) (GEC025379 - GEC025400)
Third Layer Excess	Tab 17	Prudential Re DXC DX 0250 (5M) (GEC025731 - GEC025739)

Excess Layers	Disk, Tab #	Excess Policies
Fourth Layer Excess	Tab 18A	Lloyd's 77 DD 1631C (8M) (GEC025740 - GEC025775)
	Tab 18B	*Lexington 550-63-39 (914mm as specified in Lloyd's 77 DD 1631C) (GEC025776 - GEC025784)
	Tab 18C	Prudential Re DXC DX 0251 (2M) (GEC025785 - GEC025794)
6/30/78-6/30/79		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC026053 - GEC026098)
	Tab 13B3	Northbrook 63-002-048 (1M) (GEC026099 - GEC026114)
Second Layer Excess	Tab 14A2	Lloyd's 76 DD 1595C (5M) (GEC026115 - GEC026136)
Third Layer Excess	Tab 19A	Lloyd's 78 DD 1417C (9M) (GEC026137 - GEC026178)
	Tab 19B	*Lexington 5510442 (773,100 as specified in Lloyd's 78 DD 1417C) (GEC026179 - GEC026188)
	Tab 19C	Granite State 6178-0491 (5M) (GEC026189 - GEC026196)
	Tab 19D	Gerling Konzern 01/49/99/6282 (1M) (GEC026197)
6/30/79-6/30/80		
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC026497 - GEC026549)
	Tab 20B1	Northbrook 63-005-793 (1M) (GEC026550 - GEC026553)
Second Layer Excess	Tab 21A	Lloyd's 79 DD 1634C (7.5M) (GEC026554 - GEC026603)
	Tab 21B	*Lexington 5514585 (803,250 as specified in Lloyd's 79 DD 1634C) (GEC026604 - GEC026614)
	Tab 21C	Granite State 6179-1383 (3.75M) (GEC026615 - GEC026622)
	Tab 21D	Northbrook 63-005-794 (3.75M) (GEC026623 - GEC026629)
6/30/80-6/30/81		

Excess Layers	Disk, Tab #	Excess Policies
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC026497 - GEC026549)
	Tab 20B2	Northbrook 63-005-793 (1M) (GEC027007 - GEC027016)
Second Layer Excess	Tab 22A	Lloyd's 80 DD 1643C (11.25M) (GEC027017 - GEC027041)
	Tab 22B	*Lexington 5540469 (1,201,500 as specified by Lloyd's 80 DD1643C) (GEC027042 - GEC027049)
	Tab 22C	Granite State 6480-5013 (4M) (GEC027050 - GEC027058)
	Tab 22D	Northbrook 63-006-854 (3.75M) (GEC027059 - GEC027063)
	Tab 22E	Transit SCU 955-565 (1M) (GEC027064 - GEC027069)
6/30/81-6/30/82		
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC026497 - GEC026549)
	Tab 20B2	Northbrook 63 005 793 (1M) (GEC027007 - GEC027016)
Second Layer Excess	Tab 22A	Lloyd's 80 DD 1643C (11.25M) (GEC027017 - GEC027041)
	Tab 22B	*Lexington 5540469 (1,201,500 as specified by Lloyd's 80 DD 1643C) (GEC027042 - GEC027049)
	Tab 23A	Granite State 6481-5220 (4M) (GEC027464 - GEC027472)
	Tab 23B	Northbrook 63 008 153 (3.75M) (GEC027473 - GEC027483)
	Tab 23C	Transit SCU 955-978 (1M) (GEC027484 - GEC027492)
6/30/82-6/30/83		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) (GEC028307 - GEC028360)
	Tab 24B	Transit UMB 950-239 (1M) (GEC027951 - GEC027962)
Second Layer Excess	Tab 25A1	Lloyd's KYO 17782 (11.25M) (GEC027963 - GEC027995)
	Tab 25B	Transit SCU 956-259 (4.75M) (GEC027996 - GEC028004)
	Tab 25C	Granite State 6482-5442 (4M) (GEC028005 - 028015)

Excess Layers	Disk, Tab #	Excess Policies
6/30/83-6/30/84		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) (GEC028307 - GEC028360)
	Tab 26	Transit UMB 950-239 (1M) (GEC028361 - GEC028372)
Second Layer Excess	Tab 25A2	Lloyd's KYO 17782 (11.25M) (GEC028373 - GEC028391)
	Tab 27A	Transit SCU 956-535 (4.75M) (GEC028392 - GEC028401)
	Tab 27B	Granite State 6483-5666 (4M) (GEC028402 - GEC028411)
6/30/84-6/30/85		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) GEC028307 - GEC028360
	Tab 26	Transit UMB 950-239 (0.75M) (GEC028361 - GEC028372)
	Tab 28	Pacific XMO 01 72 04 (0.25M) (GEC028785 - GEC028793)
Second Layer Excess	Tab 25A3	Lloyd's KYO 17782 (11.25M) (GEC028794 - GEC028818)
	Tab 29A	Granite State 6484-5867 (4.75) (GEC028819 - GEC028824)
	Tab 29B	Pacific XCC 01 22 83 (1.75M) (GEC028825 - GEC028831)
	Tab 29C	Transit SCU 956-881 (1.25M) (GEC028832 - GEC028841)
	Tab 29D	Continental RDX 178-45-29 (1M) (GEC028842 - GEC028852)
6/30/85 - 6/30/86		
First Layer Excess	Tab 30	Pacific XMO 017211 (1M) (GEC029337 - GEC029344)
Second Layer Excess	Tab 31	Pacific XCC 012315 (1M) (GEC029358 - GEC029360)

ATTACHMENT "A-1" TO AFFIDAVIT OF ELLEN PRESBY

**THE GEC POLICIES
June 30, 1971 – June 30, 1988**

PRIMARY LIABILITY POLICIES

Continental Casualty Company (CNA)

CCP 902-36-70 (6/30/73-6/30/76): Tab 1 (Bates Nos. GEC 029630 - GEC 029746)

CCP 248-3440 (6/30/76-6/30/83): Tab 2 (Bates Nos. GEC 029747 - GEC 030020)

CCP 248-3440 (6/30/83-6/30/88): Tab 3 (Bates Nos. GEC 030188 - GEC 030301)

EXCESS/UMBRELLA LIABILITY POLICIES

Admiral Insurance Company

75 DD 0164 (SCX 0369) (6/30/75-6/30/76): Tab 10D (Bates Nos. GEC 025038 - GEC 025045)

American Employers' Insurance Company

EY-8220-005 (6/30/71-6/30/74): Tab 4 (Bates Nos. GEC 024585 - GEC 024629)

California Union Insurance Company

ZCX 0001391 (Cover Sheet 34078) (6/30/75-6/30/76): Tab 11D (Bates Nos. GEC 025070 - GEC 025071)

Central National Insurance Company of Omaha

CNU 12-33-83 (6/30/75-6/30/76): Tab 10C (Bates Nos. GEC 025032 - GEC 025037)

Continental Casualty Company (CNA)

RDX 893-68-33 (8/9/73-6/30/74): Tab 6B (Bates Nos. GEC 024648 - GEC 024649)

RDX 033 915 66 45 (6/30/74-6/30/77): Tabs 8, 12 and 15 (Bates Nos. GEC 024736 - GEC 024742, GEC 025072 – GEC 025078, and GEC 025408 – GEC 025414)

RDX 178-45-29 (6/30/84-6/30/85): Tab 29D (Bates Nos. GEC 028842 - GEC 028852)

First State Insurance Company

922099 (6/30/75-6/30/76): Tab 11C (Bates Nos. GEC 025063 - GEC 025069)

Gerling-Konzern

01/49/99/6282 (6/30/78-6/30/79): Tab 19D (Bates No. GEC 026197)

Granite State Insurance Company

6178-0491 (6/30/78-6/30/79): Tab 19C (Bates Nos. GEC 026189 - GEC 026196)

6179-1383 (6/30/79-6/30/80): Tab 21C (Bates Nos. GEC 026615 - GEC 026622)

6480-5013 (6/30/80-6/30/81): Tab 22C (Bates Nos. GEC 027050 - GEC 027058)

6481-5220 (6/30/81-6/30/82): Tab 23A (Bates Nos. GEC 027464 - GEC 027472)
6482-5442 (6/30/82-6/30/83): Tab 25C (Bates Nos. GEC 028005 - GEC 028015)
6483-5666 (6/30/83-6/30/84): Tab 27B (Bates Nos. GEC 028402 - GEC 028411)
6484-5867 (6/30/84-6/30/85): Tab 29A (Bates Nos. GEC 028819 - GEC 028824)

Home Insurance Company

HEC 9 91 99 45 (6/30/71-6/30/74): Tab 5 (Bates Nos. GEC 024630 - GEC 024638)

Insurance Company of North America (INA)

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Lexington Insurance Company

550-63-39 (6/30/77-6/30/78): Tab 18B (Bates Nos. GEC 025776 - GEC 025784)
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5540469 (6/30/80-6/30/82): Tab 22B (Bates Nos. GEC 027042 - GEC 027049)

Lloyd's

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77 DD 1631C (6/30/77-6/30/78): Tab 18A (Bates Nos. GEC 025740 - GEC 025775)
78 DD 1417C (6/30/78-6/30/79): Tab 19A (Bates Nos. GEC 026137 - GEC 026178)
79 DD 1633C (6/30/79-6/30/82): Tab 20A (Bates Nos. GEC 026497 - GEC 026549)
79 DD 1634C (6/30/79-6/30/80): Tab 21A (Bates Nos. GEC 026554 - GEC 026603)
80 DD 1643C (6/30/80-6/30/82): Tab 22A (Bates Nos. GEC 027017 - GEC 027041)
KYO 17582 (6/30/82-6/30/85): Tab 24A (Bates Nos. GEC 028307 - GEC 028360)
KYO 17782 (6/30/82-6/30/85): Tabs 25A1, 25A2 and 25A3 (Bates Nos. GEC 027963 - GEC 027995, GEC 028373 - GEC 028391, and GEC 028794 - GEC 028818)

New Hampshire Insurance Company

5175-0444 (6/30/75-6/30/76): Tab 10B (Bates Nos. GEC 025025 - GEC 025031)
5175-0445 (6/30/75-6/30/76): Tab 11B (Bates Nos. GEC 025056 - GEC 025062)

Northbrook Excess and Surplus Insurance Company

63-001-170 (6/30/75-6/30/76): Tab 9 (Bates Nos. GEC 024988 - GEC 025014)
63-001-171 (6/30/75-6/30/76): Tab 10A (Bates Nos. GEC 025015 - GEC 025024)
63-001-172 (6/30/75-6/30/76): Tab 11A (Bates Nos. GEC 025046 - GEC 025055)
63-002-048 (6/30/76-6/30/79): Tabs 13B1, 13B2 and 13B3 (Bates Nos. GEC 025356 - GEC 025378, GEC 025715 - GEC 025730, and GEC 026099 - GEC 026114)
63-005-793 (6/30/79-6/30/82): Tabs 20B1 and 20B2 (Bates Nos. GEC 026550 - GEC 026553, and GEC 027007 - GEC 027016)
63-005-794 (6/30/79-6/30/80): Tab 21D (Bates Nos. GEC 026623 - GEC 026629)
63-006-854 (6/30/80-6/30/81): Tab 22D (Bates Nos. GEC 027059 - GEC 027063)
63-008-153 (6/30/81-6/30/82): Tab 23B (Bates Nos. GEC 027473 - GEC 027483)

Pacific Employers Group

XMO 01 72 04 (6/30/84-6/30/85): Tab 28 (Bates Nos. GEC 028785 - GEC 028793)
XCC 01 22 83 (6/30/84-6/30/85): Tab 29B (Bates Nos. GEC 028825 - GEC 028831)
XMO 017211 (6/30/85-6/30/86): Tab 30 (Bates Nos. GEC 029337 - GEC 029344)
XCC 012315 (6/30/85-6/30/86): Tab 31 (Bates Nos. GEC 029358 - GEC 029360)

Prudential Reinsurance Company

DXC 901145 (6/30/76-6/30/77): Tab 14B (Bates Nos. GEC 025401 - GEC 025407)
DXC DX 0250 (6/30/77-6/30/78): Tab 17 (Bates Nos. GEC 025731 - GEC 025739)
DXC DX 0251 (6/30/77-6/30/78): Tab 18C (Bates Nos. GEC 025785 - GEC 025794)

Transit Casualty Company

SCU 955-565 (6/30/80-6/30/81): Tab 22E (Bates Nos. GEC 027064 - GEC 027069)
SCU 955-978 (6/30/81-6/30/82): Tab 23C (Bates Nos. GEC 027484 - GEC 027492)
UMB 950-239 (6/30/82-6/30/85): Tabs 24B and 26 (Bates Nos. GEC 027951 - GEC 027962, and GEC 028361 - GEC 028372)
SCU 956-259 (6/30/82-6/30/83): Tab 25B (Bates Nos. GEC 027996 - GEC 028004)
SCU 956-535 (6/30/83-6/30/84): Tab 27A (Bates Nos. GEC 028392 - GEC 028401)
SCU 956-881 (6/30/84-6/30/85): Tab 29C (Bates Nos. GEC 028832 - GEC 028841)

Unigard Mutual Insurance Company

1-2517 (6/30/74-6/30/75): Tab 7 (Bates Nos. GEC 024722 - GEC 024735)

ATTACHMENT "A-2" TO AFFIDAVIT OF ELLEN PRESBY

**THE GEC POLICIES
CHRONOLOGICALLY, BY LAYER
June 30, 1971 – June 30, 1988**

Primary Layer	Disk, Tab #	Primary Policies
6/30/73 – 6/30/76	Tab 1	Continental Casualty CCP 902-36-70 (GEC 029630 – GEC 029746)
6/30/76 – 6/30/83	Tab 2	Continental Casualty CCP 248-3440 (GEC 029747 – GEC 030020)
6/30/83 – 6/30/88	Tab 3	Continental Casualty CCP 248-3440 (GEC 030188 – GEC 030301)

Excess Layers	Disk, Tab #	Excess Policies
6/30/71-6/30/74		
First Layer Excess	Tab 4	American Employers EY-8220-005 (5M) (GEC 024585 – GEC 024629)
Second Layer Excess	Tab 5	Home Insurance HEC 9 91 99 45 (5M) (GEC 024630 – GEC 024638)
Third Layer Excess	Tab 6A Tab 6B	INA XCP 37 45 (10M) (GEC 024639 – GEC 024647) Continental Casualty RDX 893-68-33 (10M) (8/9/73-6/30/74) (GEC 024648 – GEC 024649)
6/30/74 – 6/30/75		
First Layer Excess	Tab 7	Unigard Mutual Insurance Company 1-2517 (10M) (GEC 024722 – GEC 024735)
Second Layer Excess	Tab 8	Continental Casualty RDX 033 915 66 45 (10M) (GEC 024736 – GEC 024742)
6/30/75-6/30/76		
First Layer Excess	Tab 9	Northbrook 63-001-170 (1M) (GEC 024988 – GEC 025014)

Excess Layers	Disk, Tab #	Excess Policies
Second Layer Excess	Tab 10A	Northbrook 63-001-171 (1.5M) (GEC 025015 – GEC 025024)
	Tab 10B	New Hampshire 5175-0444 (1M) (GEC 025025 – GEC 025031)
	Tab 10C	Central National CNU 12-33-83 (1M) (GEC 025032 – GEC 025037)
	Tab 10D	Admiral 75 DD 0164 (SCX 039) (0.5M) (GEC 025038 – GEC 025045)
Third Layer Excess	Tab 11A	Northbrook 63 001 172 (3.5M) (GEC 025046 – GEC 025055)
	Tab 11B	New Hampshire 5175-0445 (0.625M) (GEC 025056 – GEC 025062)
	Tab 11C	First State 922099 (0.625M) (GEC 025063 – GEC 025069)
	Tab 11D	California Union ZCX 0001391 (0.25M) (Bowring Cover Note 34078) (GEC 025070 – GEC 025071)
Fourth Layer Excess	Tab 12	Continental Casualty RDX 033 915 66 45 (10M) (GEC 025072 – GEC 025078)
6/30/76-6/30/77		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC 026053 – GEC 026098)
	Tab 13B1	Northbrook 63-002-048 (1M) (GEC 025356 – GEC 025378)
Second Layer Excess	Tab 14A1	Lloyd's 76 DD 1595C (4M) (GEC 025379 – GEC 025400)
	Tab 14B	Prudential Re DXC 901145 (1M) (GEC 025401 – GEC 025407)
Third Layer Excess	Tab 15	Continental Casualty RDX 033 915 66 45 (10M) (GEC 025408 – GEC 025414)
6/30/77-6/30/78		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC 026053 – GEC 026098)
	Tab 13B2	Northbrook 63-002-048 (1M) (GEC 025715 – GEC 025730)
Second Layer Excess	Tab 14A1	Lloyd's 76 DD 1595C (5M) (GEC 025379 – GEC 025400)
Third Layer Excess	Tab 17	Prudential Re DXC DX 0250 (5M) (GEC 025731 – GEC 025739)

Excess Layers	Disk, Tab #	Excess Policies
Fourth Layer Excess	Tab 18A	Lloyd's 77 DD 1631C (8M) (GEC 025740 – GEC 025775)
	Tab 18B	*Lexington 550-63-39 (914mm as specified in Lloyd's 77 DD 1631C) (GEC 025776 – GEC 025784)
	Tab 18C	Prudential Re DXC DX 0251 (2M) (GEC 025785 – GEC 025794)
6/30/78-6/30/79		
First Layer Excess	Tab 13A	Lloyd's 76 DD 1594C (4M) (GEC 026053 – GEC 026098)
	Tab 13B3	Northbrook 63-002-048 (1M) (GEC 026099 – GEC 026114)
Second Layer Excess	Tab 14A2	Lloyd's 76 DD 1595C (5M) (GEC 026115 – GEC 026136)
Third Layer Excess	Tab 19A	Lloyd's 78 DD 1417C (9M) (GEC 026137 – GEC 026178)
	Tab 19B	*Lexington 5510442 (773,100 as specified in Lloyd's 78 DD 1417C) (GEC 026179 – GEC 026188)
	Tab 19C	Granite State 6178-0491 (5M) (GEC 026189 – GEC 026196)
	Tab 19D	Gerling Konzern 01/49/99/6282 (1M) (GEC 026197)
6/30/79-6/30/80		
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC 026497 – GEC 026549)
	Tab 20B1	Northbrook 63-005-793 (1M) (GEC 026550 – GEC 026553)
Second Layer Excess	Tab 21A	Lloyd's 79 DD 1634C (7.5M) (GEC 026554 – GEC 026603)
	Tab 21B	*Lexington 5514585 (803,250 as specified in Lloyd's 79 DD 1634C) (GEC 026604 – GEC 026614)
	Tab 21C	Granite State 6179-1383 (3.75M) (GEC 026615 – GEC 026622)
	Tab 21D	Northbrook 63-005-794 (3.75M) (GEC 026623 – GEC 026629)
6/30/80-6/30/81		
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC 026497 – GEC 026549)
	Tab 20B2	Northbrook 63-005-793 (1M) (GEC 027007 – GEC 027016)

Excess Layers	Disk, Tab #	Excess Policies
Second Layer Excess	Tab 22A	Lloyd's 80 DD 1643C (11.25M) (GEC 027017 – GEC 027041)
	Tab 22B	*Lexington 5540469 (1,201,500 as specified by Lloyd's 80 DD1643C) (GEC 027042 – GEC 027049)
	Tab 22C	Granite State 6480-5013 (4M) (GEC 027050 – GEC 027058)
	Tab 22D	Northbrook 63-006-854 (3.75M) (GEC 027059 – GEC 027063)
	Tab 22E	Transit SCU 955-565 (1M) (GEC 027064 – GEC 027069)
6/30/81-6/30/82		
First Layer Excess	Tab 20A	Lloyd's 79 DD 1633C (4M) (GEC 026497 – GEC 026549)
	Tab 20B2	Northbrook 63 005 793 (1M) (GEC 027007 – GEC 027016)
Second Layer Excess	Tab 22A	Lloyd's 80 DD 1643C (11.25M) (GEC 027017 – GEC 027041)
	Tab 22B	*Lexington 5540469 (1,201,500 as specified by Lloyd's 80 DD 1643C) (GEC 027042 – GEC 027049)
	Tab 23A	Granite State 6481-5220 (4M) (GEC 027464 – GEC 027472)
	Tab 23B	Northbrook 63 008 153 (3.75M) (GEC 027473 – GEC 027483)
	Tab 23C	Transit SCU 955-978 (1M) (GEC 027484 – GEC 027492)
6/30/82-6/30/83		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) (GEC 028307 – GEC 028360)
	Tab 24B	Transit UMB 950-239 (1M) (GEC 027951 – GEC 027962)
Second Layer Excess	Tab 25A1	Lloyd's KYO 17782 (11.25M) (GEC 027963 – GEC 027995)
	Tab 25B	Transit SCU 956-259 (4.75M) (GEC 027996 – GEC 028004)
	Tab 25C	Granite State 6482-5442 (4M) (GEC 028005 – GEC 028015)

Excess Layers	Disk, Tab #	Excess Policies
6/30/83-6/30/84		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) (GEC 028307 – GEC 028360)
	Tab 26	Transit UMB 950-239 (1M) (GEC 028361 – GEC 028372)
Second Layer Excess	Tab 25A2	Lloyd's KYO 17782 (11.25M) (GEC 028373 – GEC 028391)
	Tab 27A	Transit SCU 956-535 (4.75M) (GEC 028392 – GEC 028401)
	Tab 27B	Granite State 6483-5666 (4M) (GEC 028402 – GEC 028411)
6/30/84-6/30/85		
First Layer Excess	Tab 24A	Lloyd's KYO 17582 (4M) GEC 028307 – GEC 028360)
	Tab 26	Transit UMB 950-239 (0.75M) (GEC 028361 – GEC 028372)
	Tab 28	Pacific XMO 01 72 04 (0.25M) (GEC 028785 – GEC 028793)
Second Layer Excess	Tab 25A3	Lloyd's KYO 17782 (11.25M) (GEC 028794 – GEC 028818)
	Tab 29A	Granite State 6484-5867 (4.75) (GEC 028819 – GEC 028824)
	Tab 29B	Pacific XCC 01 22 83 (1.75M) (GEC 028825 – GEC 028831)
	Tab 29C	Transit SCU 956-881 (1.25M) (GEC 028832 – GEC 028841)
	Tab 29D	Continental Casualty RDX 178-45-29 (1M) (GEC 028842 – GEC 028852)
6/30/85 – 6/30/86		
First Layer Excess	Tab 30	Pacific XMO 017211 (1M) (GEC 029337 – GEC 029344)
Second Layer Excess	Tab 31	Pacific XCC 012315 (1M) (GEC 029358 – GEC 029360)